



Indiana Department of Environmental Management
Office of Air Quality
Rule Fact Sheet
February 6, 2002

Development of Amendments to Rules Concerning Fluoride Emission Limits for Existing Aluminum Plants
#99-177(APCB) / LSA Document #99-177

Overview

Repeals 326 IAC 11-5 concerning fluoride emissions for existing aluminum plants, because it has been superseded by 326 IAC 20-24.

Citations Affected

Repeals 326 IAC 11-5.

Affected Persons

Alcoa, located in Warrick County, is the only aluminum plant affected by this rulemaking.

Potential Cost

This rulemaking will eliminate potentially duplicative or inconsistent sampling requirements. This rulemaking will reduce costs while maintaining environmental protection.

Description

326 IAC 11-5 was developed for existing sources after U.S. EPA promulgated a new source performance standard (NSPS) for primary aluminum reduction plants for new sources.

On June 3, 1998, the Air Pollution Control Board final adopted a new rule, 326 IAC 20-24, that incorporated by reference the national emission standard for hazardous air pollutants (NESHAPs) for primary aluminum reduction plants. The only source in Indiana this rule

applies to is Alcoa. This rule became effective on November 8, 1998.

Alcoa requested that IDEM repeal the state rule 326 IAC 11-5. The request is based on the fact that 326 IAC 20-24 is more stringent and monitors the same fluoride emissions as 326 IAC 11-5. Compliance with the emission limitations under 326 IAC 20-24 will require better control of emissions with a more stringent emission limit, while repeal of 326 IAC 11-5 removes costly sampling requirements that are not required under 326 IAC 20-24. However, 326 IAC 20-24 does require emissions sampling at the primary control, the scrubber, and the roof monitor in order to demonstrate compliance. Removing sampling requirements specific to 326 IAC 11-5 will not result in less environmental protection or less stringent requirements since Alcoa must comply with the more stringent requirements of 326 IAC 20-24.

The requirements of 326 IAC 11-5, when compared to 326 IAC 20-24, are less stringent. The requirements of 326 IAC 11-5 include compliance with a collection efficiency of ninety percent (90%) and a control efficiency of ninety-five percent (95%). Alcoa is required under 326 IAC 20-24 to maintain a collection efficiency of ninety-eight and five-tenths percent (98.5%) and a control efficiency of ninety-nine and two-tenths percent (99.2%). In addition, 326 IAC 20-24 includes a limit on the

emissions of total fluorides and requires Alcoa to limit total fluoride emissions to one and nine-tenths (1.9) pounds of total fluoride per ton of aluminum produced in order to meet the requirements of 326 IAC 20-24.

IDEM believes it is appropriate to repeal 326 IAC 11-5 because it has now been superseded by 326 IAC 20-24 and repeal will eliminate potentially duplicative or inconsistent sampling requirements without lessening the protection of the environment.

action can be obtained by calling (800) 451-6027 (in Indiana), press 0 and ask for Gayla Killough, Rule Development Section, Office of Air Quality, (or extension 3-8628) or dial (317) 233-8628.

Consideration of Factors Outlined in Indiana Code 13-14-8-4

Indiana Code 13-14-8-4 requires that in adopting rules and establishing standards, the board shall take into account the following:

- 1) All existing physical conditions and the character of the area affected.
- 2) Past, present, and probable future uses of the area, including the character of the uses of surrounding areas.
- 3) Zoning classifications.
- 4) The nature of the existing air quality or existing water quality, as appropriate.
- 5) Technical feasibility, including the quality conditions that could reasonably be achieved through coordinated control of all factors affecting the quality.
- 6) Economic reasonableness of measuring or reducing any particular type of pollution.
- 7) The right of all persons to an environment sufficiently uncontaminated as not to be injurious to:
 - (A) human, plant, animal, or aquatic life; or
 - (B) the reasonable enjoyment of life and property.

Consistency with Federal Requirements

The repeal of this rule is consistent with federal law.

IDEM Contact

Additional information regarding this rulemaking